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20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

22
23 IN RE: CATHODE RAY TUBE (CRT)
24 ANTITRUST LITIGATION

MASTER FILE NO.. 07-cv-5944 SC

MDL NO. 1917

25 STIPULATION AND [PROPOSED]
26 ORDER
27
28

1 It is hereby stipulated by and between the Direct Purchaser Plaintiffs ("DPPs") and the
2 Indirect Purchaser Plaintiffs ("IPPs") and the undersigned defendants ("Defendants") in this action
3 as follows:

4 1. That all documents produced in the *In Re: TFT-LCD (Flat Panel) Antitrust*
5 *Litigation, Case No. M07-1827 SI ("In Re: TFT-LCD")* by entities, including their affiliates except
6 for Toshiba Mobile Display Co., Ltd., that produced documents in *In Re: TFT-LCD* and are
7 defendants in this action, can be reviewed by Plaintiffs' counsel in this action for the limited
8 purpose of identifying documents for potential production in this action pursuant to the procedures
9 described in Paragraphs 2 and 3 below. Such review will be subject to the protective order in *In*
10 *Re: TFT-LCD* (Docket No. 241) as well as the protective order herein (Docket No. 306).

11 2. On or before September 1, 2011, Plaintiffs shall provide to all defendants a list of
12 the foregoing documents from *In Re: TFT-LCD* that they seek to use in this action. The defendant
13 that produced, or whose affiliate produced, a document in *In Re: TFT-LCD* so identified
14 ("Producing Party") shall have 45 days to state objections to adding any such document to the
15 CRT discovery record. Any document as to which no objections have been made shall be deemed
16 produced herein. The parties shall meet and confer to resolve any objections made and, if
17 necessary, discuss a process for seeking a ruling from the Special Master and the Court.

18 3. After this initial list is provided, Plaintiffs may supplement the list as necessary
19 with additional documents covered by Paragraph 1 above to the extent that Plaintiffs were in good
20 faith unable to finish their review of documents for inclusion in the list contemplated by Paragraph
21 2 above. Plaintiffs shall provide notice to all defendants of any additions to the list of documents
22 from the *TFT-LCD* action that they seek to use in this action, absent a showing of good cause, no
23 later than seven calendar days before intended use in any deposition, submission or other
24 proceeding, and no later than 30 days prior to the discovery cut off. Absent a showing of good
25 cause, Plaintiffs may identify no more than ten additional documents in advance of each
26 deposition. The Producing Party shall promptly state objections to adding any document
27 identified by Plaintiffs to the CRT discovery record, if any, and the parties shall use the
28 procedures agreed upon for resolution of disputes as stated in Paragraph 2 above. Any such

1 resolution will be done on an expedited basis so as not to disrupt the taking of a noticed
2 deposition, or the continuance of any pre-trial dates.

3 4. All objections by Defendants with respect to relevancy and admissibility are
4 preserved as to any document from *In Re: TFT-LCD* that may be produced pursuant to the
5 foregoing procedures.

6 5. Absent Court order, this stipulation shall not apply to LG Display Co., Ltd. and LG
7 Display America, Inc. (collectively "LG Display"). Nothing in this stipulation shall preclude
8 Plaintiffs from seeking in this litigation the production of documents produced by LG Display in
9 *In Re: TFT-LCD*.

10 DATED: June 17, 2011

SAVERI & SAVERI, INC.
GUIDO SAVERI
R. ALEXANDER SAVERI
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By: /s/ Guido Saveri

GUIDO SAVERI
*Interim Lead Counsel for the
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16 DATED: June 17, 2011

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21 DATED: June 17, 2011

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1 DATED: June 17, 2011

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3 By: /s/ Eric Shapland

4 ERIC SHAPLAND
5 *Counsel for Defendants LG Electronics, Inc., LG*
6 *Electronics USA, Inc. and LG Electronics Taiwan*
7 *Taipei Co., Ltd.*

8 DATED: June 17, 2011

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9 By: /s/ Jeffrey L. Kessler

10 JEFFREY L. KESSLER
11 *Counsel for Defendants Panasonic Corporation of*
12 *North America, MT Picture Display Co., Ltd. and*
13 *Panasonic Corporation (f/k/a/ Matsushita Electric*
14 *Industrial Co.)*

15 DATED: June 17, 2011

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16 By: /s/ Joseph Ostoyich

17 JOSEPH OSTOYICH
18 *Counsel for Defendants Koninklijke Philips Electronics*
19 *N.V., Philips Electronics North America Corporation,*
20 *Philips Electronica Industries (Taiwan), Ltd., and*
21 *Philips da Amazonia Industria Electronica Ltda.*

22 DATED: June 17, 2011

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23 By: /s/ James L. McGinnis

24 JAMES L. MCGINNIS
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27 *Samsung SDI (Malaysia) Sdn. Bhd., Samsung SDI*
28 *Mexico S.A. de C.V., Samsung SDI Brasil Ltda.,*
Shenzhen Samsung SDI Co. Ltd., and Tianjin Samsung
SDI Co., Ltd.

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1 DATED: June 17, 2011

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3 By: /s/ Ian Simmons

4 IAN SIMMONS
5 Counsel for Defendants Samsung Electronics Co., Ltd.
and Samsung Electronics America, Inc.

6 DATED: June 17, 2011

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8 By: /s/ Patrick J. Ahern

9 PATRICK J. AHERN
10 Counsel for Defendant Tatum Company of America,
Inc.

11 DATED: June 17, 2011

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13 By: /s/ Lucius B. Lau

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15 Counsel for Defendants Toshiba Corporation, Toshiba
16 America, Inc., Toshiba America Information Systems,
Inc., Toshiba America Consumer Products, L.L.C., and
Toshiba America Electronic Components, Inc.

17 DATED: June 17, 2011

FRESHFIELDS BRUCKHAUS DERINGER US
LLP
TERRY CALVANI

18
19 By: /s/ Terry Calvani

20 TERRY CALVANI
21 Counsel for Defendant Beijing Matsushita Color CRT
22 Company, Ltd.

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Lauren C. Russell, attest that concurrence in the filing of this document has been obtained from all signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of June 2011, at San Francisco, California.

/s/ Lauren C. Russell

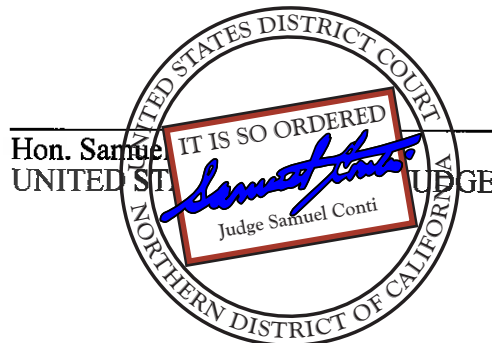
IT IS SO RECOMMENDED.

DATED: June 20, 2011

Charles A. Legge
Hon. Charles A Legge
Special Master

IT IS SO ORDERED UPON THE RECOMMENDATION OF THE SPECIAL MASTER.

DATED: June 29, 2011



PEARSON, SIMON, WARSHAW & PENNY, LLP
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